

1 MELINDA HAAG (CABN 132612)
United States Attorney
2 J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division
3 STACEY GEIS (CABN 181444)
KIM A. BERGER (NYBN 2481679)
4 Assistant United States Attorneys
BRETT J. MORRIS (CABN 158408)
5 Special Assistant United States Attorney
6

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7126
FAX: (415) 436-7234
Stacey.Geis@usdoj.gov

10 | Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) CASE NO. CR 14-00175 (TEH)
)
PLAINTIFF,) STIPULATION AND [PROPOSED] ORDER TO
)
) EXCLUDE TIME
v.)
)
PACIFIC GAS AND ELECTRIC COMPANY,)
)
DEFENDANT.)
)

With the agreement of the parties in open court on April 21, 2014, and with the consent of the defendant Pacific Gas And Electric Company (“defendant”), the Court enters this order 1) ordering the next appearance in front of this Court on June 2, 2014 at 2:30 p.m. for a status conference, and 2) documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161, from April 21, 2014 to June 2, 2014 at 2:30 p.m. The parties agree, and the Court finds and holds, as follows:

1. The Court finds that, taking into the account the public interest in the prompt disposition of criminal cases, excluding time until June 2, 2014 is necessary because the case is complex, see 18

1 U.S.C. § 3161(h)(7)(A) & (B)(ii), and for effective preparation of counsel and for continuity of counsel.
2 See 18 U.S.C. § 3161(h)(7)(A) & (B)(iv). The government recently indicted this case, which involves
3 allegations of violations of the Pipeline Safety Act stemming from defendant's gas operations.
4 Discovery in this case involves millions of pages of documents, coming from various entities. The
5 government will be providing discovery to the defense within the week. The defense needs adequate
6 time to review the discovery. Accordingly, the Court finds that the ends of justice served by excluding
7 the period from April 21, 2014 to June 2, 2014, outweigh the best interest of the public and the
8 defendant in a speedy trial. Id. § 3161(h)(7)(A) & (B)(iv).

9 2. Accordingly, and with the consent of the defendant, the Court orders that 1) defendant shall
10 make its next appearance in front of this court on June 2, 2014, at 2:30 p.m. for further status; and 2) the
11 period from April 21, 2014 to June 2, 2014, be excluded from Speedy Trial Act calculations under 18
12 U.S.C. § 3161 (h)(7)(A) & (B)(ii) & (iv).

13 IT IS SO STIPULATED.

14 DATED: May 27, 2014

/s/ _____
15 Steven M. Bauer, Esq.
Attorney for Pacific Gas And Electric Company

16 DATED: May 27, 2014

/s/ _____
17 Walter F. Brown, Esq.
Attorney for Pacific Gas And Electric Company

19 DATED: May 27, 2014

/s/ _____
20 Stacey P. Geis
Assistant U.S. Attorney

22 IT IS SO ORDERED.

24 DATED: May 27, 2014

